

HONORABLE THOMAS O. RICE

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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WASHINGTON

CHRIST'S CHURCH OF MT.)	
SPOKANE; WESTGATE CHAPEL,)	No. 2:20-CV-197-TOR
)	
Plaintiffs,)	DECLARATION OF
v.)	SHERIFF OZZIE
)	KNEZOVICH
JAY INSLEE, et al.)	
)	
Defendants.)	

I, OZZIE KNEZOVICH, declare under the penalty of the laws of the State of Washington that the following statements are true and correct to the best of my knowledge and belief:

1. I am above the age of 18 and competent to testify to the matters stated herein, which are based on my own personal knowledge.
2. I am one of the Defendants in this matter.
3. I am the duly elected Sheriff for Spokane County.

1 4. In March 2020, after Governor Inslee issued his initial “Stay Home, Stay
2 Healthy” proclamation, I met with my command staff and other local agencies to determine
3 the best approach to accomplish the goals of the Governor’s proclamation.

4 5. In conjunction with other local jurisdictions and the Spokane Regional
5 Health District (SRHD), a plan was developed to address reports of non-compliance with
6 the Governor’s proclamation.

7 6. The plan focused primarily on providing education to the community on how
8 to comply with the Governor’s proclamations. The primary goal of the plan is to achieve
9 voluntary compliance with the Governor’s proclamations through education and
10 collaboration with the community. The Spokane County Sheriff’s Office has worked with
11 other religious organizations to help them facilitate religious services in compliance with
12 the Governor’s proclamations.

13 7. The role of the Spokane County Sheriff’s Office is to contact organizations
14 that have received complaints of non-compliance and educate those organizations on how
15 to become and remain compliant.

16 8. Based upon the limited resources and manpower of my office, I have directed
17 my deputies to respond to complaints of violations of the Governor’s Proclamations but
18 not to proactively monitor for organizations operating in contravention of the Governor’s
19 Proclamations.

20 9. The plan contemplates that in the event an organization repeatedly and
21 consistently refused to comply with the Governor’s proclamation, law enforcement would
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1 forward the details of their educational outreach with the organization to the SRHD for
2 review and determination regarding filing for a temporary restraining order. The plan does
3 not contain any provision for criminal enforcement of the governor's proclamation.

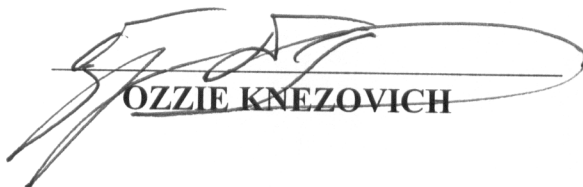
4 10. The implementation of the plan has been successful in gaining voluntary
5 compliance through educational outreach and the Spokane County Sheriff's Office has no
6 intention to alter or modify the plan moving forward.

7 11. To date, the Spokane County Sheriff's Office has not forwarded any cases of
8 non-compliance with the Governor's proclamations for legal action.

9 12. To date, the Spokane County Sheriff's Office has not received any
10 complaints of non-compliance with the Governor's proclamations against the Plaintiff,
11 Christ's Church of Mt. Spokane.

12 13. To date, the Spokane County Sheriff's Office has had no contact with the
13 Plaintiff, Christ's Church of Mt. Spokane, regarding compliance with the Governor's
14 proclamations.

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18 DATED this 21st day of December, 2020 in Spokane, Washington.

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1 **CERTIFICATE OF SERVICE**

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3 I hereby certify that on December 22, 2020, I electronically filed the

4 foregoing with the Clerk of the Court using the CM/ECF System, which in turn

5 automatically generated a Notice of Electronic Filing (NEF) to all parties in the

6 case who are registered users of the CM/ECF system. The NEF for the foregoing

7 specifically identifies recipients of electronic notice.

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